

One Riverside Drive East Hartford, CT 06118 800.889.3282 www.goodwin.edu

Narrative Information Sheet

EPA Brownfields Cleanup Grant FY19

CFDA No. 66-818

Funding Opportunity Number: EPA-OLEM-OBLR-18-07

Applicant Identification

Goodwin College, Inc., One Riverside Drive, East Hartford, CT 06118-1837

Funding Requested

- a. Single site cleanup.
- b. Federal funds requested: \$415,273. No cost share waiver being sought.
- c. Contamination. Hazardous substances and petroleum. Breakdown is \$116,193 for hazardous substances and \$239,328 for petroleum.

Location

- a. East Hartford
- b. Hartford County
- c. Connecticut

Property Information

Former East Hartford Tire Company property, 339 Main Street, East Hartford, CT, 06118-1837. The property is owned by Goodwin College. The purchase was closed on Nov. 3, 2017.

Contacts

- a. Project Director: Bryant Harrell, Vice President for Facilities and IT. Phone: (860) 727-6756. Email: bharrell@goodwin.edu
- b. Chief Executive: Mark E. Scheinberg, President. Phone: (860) 727-6757. Email: mscheinberg@goodwin.edu.

Population

51, 252 (US Census Bureau, 2010 Census)

Other Factors Checklist

No checklist factors apply to this property.

Letter from the State or Tribal Environmental Authority

Letter obtained from CT Department of Energy and Environmental Protection (CT DEEP).

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December 10, 2018

Christopher G. Blake, Grants Officer Goodwin College 1 Riverside Drive East Hartford, CT 06118

Re: State Acknowledgement Letter for EPA Brownfields Cleanup Grant for FY 19

Dear Mr. Blake:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that Goodwin College intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2019. Goodwin College plans to use the grant funding to conduct cleanup of hazardous substances and petroleum at 339 Main Street in East Hartford.

Cleanup work funded by an EPA grant must be performed in one of Connecticut's formal remediation programs, including among others the Voluntary Remediation program pursuant to CGS § 22a-133x, the Property Transfer Program, (if applicable) pursuant to CGS §22a-134, the Urban Sites Remedial Action Program pursuant to CGS §22a-133m, or the Brownfields Remediation and Revitalization Program pursuant to CGS §32-769.

You may want to refer to DEEP's PREPARED Municipal Workbook. This on-line guidebook is designed to help municipalities navigate the complex process of remediating and redeveloping brownfields. The Workbook is available on DEEP's web site at http://www.ct.gov/deep/cwp/view.asp?a=2715&q=555770&deepNav_GID=1626.

If you have any questions about this letter, please contact me at (860) 424-3768 or by e-mail at mark.lewis@ct.gov. Good luck with your application.

Sincerely,

c:

Mark R. Lewis

Brownfields Coordinator

Office of Constituent Affairs & Land Management

Mr. Frank Gardner, EPA (via e- mail)

Goodwin College-EPA Brownfields Cleanup Application Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION A. Target Area and Brownfields

i. Background and Description of the Target Area: Goodwin College (GC) is located on the banks of the Connecticut River in East Hartford, CT, directly east of Hartford, across the river. The town's 2010 U.S. Census population was 51,252.1 The town has a rich manufacturing history, anchored by Pratt & Whitney Aircraft, its largest employer and taxpayer. However, East Hartford has experienced a decline in recent decades as Pratt & Whitney and other manufacturers have reduced their workforce. East Hartford's 2014 Plan of Conservation and Development notes the town is somewhat more urban than its suburban neighbors, with a range of land uses, a fully developed infrastructure, and connections to the regional highway system.2 Demographically, East Hartford is racially mixed (37% white, 26% African American, 26% Hispanic, and 11% from other races). The town's poverty rate of 14.3% is above the state's rate of 9.6%. The State of Connecticut has designated East Hartford as a Distressed Municipality, based on statistical indicators that measure each municipality's fiscal capacity.⁴ State agencies use the list of Distressed Municipalities to target funds to designated municipalities. The target area is Main Street from Willow Street south to High Street. East Hartford's 2014 development plan recommended measures to strengthen Main Street as the primary commercial corridor. Specifically, the plan recommended that the Town consider adopting incentives within the B-5 zone along Main Street and the B-2 zone along Main Street between Willow Street and Brewer Street to promote ground-level restaurants, retail, and personal-service uses. Recent redevelopment efforts have focused on the Main Street Central Business District and the Silver Lane corridor, two of the town's major commercial areas.

ii. Description of the Brownfield Site: The 339 Main Street property is zoned for commercial use. The 0.82-acre site is comprised of a 12,140-square-foot, vacant one-story masonry, concrete block building constructed in 1966 and renovated in 1986 with the addition of a one-bay garage, and a paved parking lot to the south and east of the building. The site, known as East Hartford Tire Company, was a former automotive tire business, operating from 1966 to about 2017. It was also occupied by Component Finishing, Inc., a plating facility, from 1982 to 1992, and by Jim's Auto, an auto body shop, which closed in 2017. The property is currently vacant. GC acquired the property in November, 2017. Based on the results of soil and groundwater sampling and testing conducted by a licensed engineering firm and a State-certified laboratory, releases of petroleum products and other hazardous substances have occurred at the property. Copper lead, nickel, zinc, arsenic, pesticides and extractable total petroleum hydrocarbons (ETPH) are present in soil and/or groundwater at concentrations exceeding applicable remedial criteria. In addition,

¹ US Census Bureau. 2010 Census. Retrieved from:

https://www.census.gov/quickfacts/easthartfordtownhartfordcountyconnecticut

² East Hartford Plan of Conservation and Development (2014). Prepared by BFJ Planning. Adopted June 25, 2014 by the East Hartford Town Council. Retrieved from:

https://www.easthartfordct.gov/sites/easthartfordct/files/file/file/final part 1 chapters 1-5.pdf

³ US Census Bureau. 2010 Census.

⁴ State of CT, Department of Economic and Community Development. Retrieved from: https://www.ct.gov/ecd/cwp/view.asp?a=1105&q=251248

asbestos is present in caulk, glazing, vinyl and ceramic tiles, mastic and roofing materials in the building. This part of Main Street has suffered decline in recent decades, with many business moving out. It has drawn businesses like bars, gas stations, and convenience stores. The property is located close to the town's most vulnerable populations in a low and moderate income neighborhood that includes a homeless shelter, apartment buildings, and the former King Court public housing complex (purchased by GC and in the process of being rehabilitated). This property lies within the footprint of GC's campus, which includes three magnet schools that are at least 50% minority with very young students who are sensitive to environmental conditions.

B. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans: GC plans to redevelop the property to provide a new and more appropriate home for its Facilities Department administrative offices and to relocate a garage located on an adjacent property. This move frees up adjacent college-owned properties on Main Street for commercial development to further revitalize the area. Cleaning up the site will rid the neighborhood of another blighted and contaminated property and result in a productive re-use of it. Redevelopment plans are consistent with the most recent East Hartford Plan of Conservation and Development, adopted in 2014. Under Action Agenda, the plan calls for the promotion of mixed-use development of key sites in the vicinity of GC, including properties on Main Street and on either side of Ensign Street, which is within 1,000 feet of the site. This project is consistent with the town's development plan recommendation to strengthen Main Street as the town's primary commercial corridor.5 ii. Outcomes and Benefits of Redevelopment Strategy. GC's Master Plan calls for long-term redevelopment of the campus footprint. Plans include the construction of mixed-use, commercial-residential buildings at Main and Ensign Streets adjacent to Route 2 that will add 270 units of housing to serve students and the community. The 339 Main Street property is within the redevelopment area footprint. As GC continues to grow its footprint and construct new facilities to serve the college community, it requires increased services and employees in its Facilities Department. The redevelopment of this site and the increased space provides more room for anticipated hiring of new employees. The anticipated addition of a commercial mixed use building near the site will enhance the neighborhood and attract business and customers, producing revenue for the town.

C. Strategy for Leveraging Resources.

i. Resources Needed for Site Reuse: GC has a very successful track record of leveraging other funding sources for many campus projects. These include the State of Connecticut Brownfields Redevelopment Authority and the Department of Economic and Community Development (DECD), as well as the US Economic Development Administration. A recent example is the securing of \$4 million from DECD to fund critical storm water drainage improvements to the aged infrastructure within the campus footprint. These improvements will allow for future college and commercial redevelopment. Since 2012, GC has received \$1 million from the state Department of Energy and Environmental Protection (CT DEEP) to establish a two-mile

⁵ Town of East Hartford. Plan of Conservation and Development. Prepared by BFJ Planning. Adopted June 25, 2014 by the East Hartford Town Council. Retrieved from: https://www.easthartfordct.gov/development-planning/pages/plan-of-conservation-and-development

recreational trail that connects to a regional network of trails. The 339 Main Street site is part of GC's master plan redevelopment footprint. The total estimated cost of the master plan is \$38.1 million. Of that amount, GC envisions a construction loan of \$16.3 million, state funding of \$5.4 million, GC equity of \$16.4 million, and a cash investment of \$10.6 million. The master plan includes redevelopment of Ensign Street, located about 800 feet from 339 Main Street, with the addition of 270 units of new housing near Route 2. GC anticipates obtaining state economic development funding for the Master Plan projects.

<u>ii. Use of Existing Infrastructure:</u> Main Street, where the site is located, is highly developed, with bus service, utilities, restaurants, and other businesses. The project requires no infrastructure improvements.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

A. Community Need

i. The Community's Need for Funding: GC requests funding for cleanup in order to allocate limited resources to other high priority college needs. GC currently pays \$2.3 million in annual debt service to meet the need to educate its students by expanding its campus. GC educates low-income students; 91% of its students receive some form of financial aid and 86% attend part-time, while many work and raise a family. GC has \$10.6 million worth of active construction projects, including a manufacturing annex for its magnet high school, expansion of its recreational trails, renovations to King Court housing units, and various capital improvements to campus facilities. Securing brownfield funding will allow GC to distribute its resources toward serving the needy student population in the community and the state.

ii. Threat to Sensitive Populations

- 1.) Health and Welfare of Sensitive Populations: East Hartford has a higher than average incidence of respiratory disease and childhood asthma rates, as demonstrated by data from the Connecticut Department of Public Health.
- 2.) Greater than Normal Incidence of Disease and Adverse Health Conditions: Respiratory Disease is high in East Hartford, with an asthma rate of 104.79 for every 10,000 residents, compared to 59.7 for Connecticut as a whole. East Hartford's Epidemiology: Some of East Hartford's Age-adjusted Mortality Rates (AAMRs) are significantly greater than the state's. Heart and respiratory diseases, linked, are known to be strongly exacerbated by pollution, including heavy metals.

Table 1) East Hartford Epidemiology

⁶ CT Department of Public Health. Asthma ED visit rates by town of residence. Retrieved November 2018 from: https://portal.ct.gov/DPH/Health-Education-Management--Surveillance/Asthma/Asthma-Surveillance

⁷ CT Department of Public Health. East Hartford Resident Deaths, 2010-2014. Retrieved November 2018 from: https://portal.ct.gov/DPH/Health-Information-Systems--Reporting/Mortality/Mortality-Statistics

⁸ Cotes, J.E. et al., Relationship of Coronary Heart Disease to Respiratory Disability Br Med J. 1956 March 17; 1(4967): 601–603.

⁹ Kim, D.S., et al., "Heavy metal as risk factor of cardiovascular disease--an analysis of blood lead and urinary mercury." *J Prev Med Public Health*. 2005 Nov; 38(4):401-7.

In Years 2010-2014	East Hartford AAMR	Connecticut AAMR		
Heart Disease	369.28	149.94		
Chronic Lower Respiratory Diseases	35.04	30.12		

Childhood Asthma Rates. The rate of emergency department visits for asthma for East Hartford was 179.27 per 10,000 residents for children, which is significantly higher than the Connecticut average of 95.7. The rate of emergency department visits for asthma for East Hartford adults was 78.95, which was much higher than the Connecticut rate of 47.2, according to the Connecticut Department of Public Health. 10

Water Pollution: For recreational use of waters, CT DEEP water quality standards indicate the average amount of e. coli bacteria found in water should be less than 126 CFU/100 mL and that a single sample tested for E. coli should be less than 235 CFU/100mL at a designated swimming area. Samples taken at various times between 2004 and 2014 indicate that at times the level of E. coli in the Connecticut River in East Hartford exceeded the levels that would make the water unhealthy for recreational use, such as swimming. Similarly, the level of nitrogen in the water should not exceed 2/5mg/L, a level which requires further investigation. 11 High levels of nitrogen can lead to excessive growth of water plants and algae, which reduces the amount of oxygen available to living things in the water. The water sampling done in the Connecticut River adjacent to East Hartford indicate there have been several times during the sampling period from 2004 through 2014 when the nitrogen exceeded the level requiring further investigation. Traffic pollution affects East Hartford's air quality. Three major highways intersect East Hartford: Interstates 91 and 84 and State Route 2 which runs through the GC campus. I-84 carries about 142,000 vehicles per day (15% trucks) through East Hartford at the Hartford city line and at the exit for state Route 15, it averages 155,200 vehicles per day. The average daily traffic through East Hartford on state Route 2 is 74,500 vehicles, according to the state Transportation Department. According to the EPA, residents who live, work, or attend school near major roads appear to have an increased incidence and severity of health problems related to roadway traffic. Children, older adults, and those with a preexisting cardiopulmonary disease and those of low socioeconomic status are at higher risk for health impacts from air pollution near roadways. 12 The Hartford-West Hartford corridor, including East Hartford, ranked 20th for high ozone days out of 227 metropolitan areas in the US, according to the American Lung Association.¹³

Economically Impoverished/Disproportionally Impacted Populations: According to the town's development plan, East Hartford has the second-lowest median household income compared to

¹⁰ Data Source: Connecticut Hospital Information Management (CHIME), 2010-2014. Interview with Dr. Marie-Christine Bournaki, Asthma Program Supervisor, Community, Family Health & Prevention Section, Public Health Initiatives Branch, Connecticut Department of Public Health.

Connecticut Department of Energy and Environmental Protection. Water Quality Standards. Retrieved from: https://www.ct.gov/deep/cwp/view.asp?a=2719&q=325618&deepNav_GID=1654

¹² U.S. Environmental Protection Agency (EPA). How Mobile Source Pollution Affects Your Health. Retrieved from: https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health/mobile%20sources.

¹³ American Lung Association. State of the Air 2018 report. Retrieved from: https://www.long.org/our-initiatives/healthy-air/sota)city-rankings/msas/hartford-west-hartford-ct.html#ozone

its neighboring towns in 2010, at \$48,887. Hartford's median household income is lower at \$28,069, while Manchester, South Windsor, and Glastonbury, as expected in suburbs of that nature, have greater medians at \$61,731, \$88,768, and \$103,532, respectively. Least Hartford's unemployment rate has been consistently above the state's rate. Though the economic recovery has had a positive impact on both rates, East Hartford's unemployment rate as of December 2018 was 3.7%, slightly higher than Connecticut's rate of 3.2% and lower than the US rate of 3.9%. Local businesses such as Builder's First Choice, Masonicare Partners Home Health and Hospice, Conduent State Healthcare, and Greensprings Healthcare and Rehabilitation Center have experienced significant layoffs in recent years. Local businesses are such as Builder's First Choice, Masonicare Partners Home Health and Hospice, Conduent State Healthcare, and Greensprings Healthcare and Rehabilitation Center have

Welfare - Crime: The crime rate is high where the property is located. East Hartford police records from 2017 – 2018, show in the 1.5 miles on Main St. and its side streets between Silver Lane south to Brewer Street, this section experienced 141 separate crime incidents in this relatively small geographical area.¹⁶

B. Community Engagement

i. Community Involvement: GC has always engaged community partners in its initiatives, including the successful redevelopment of brownfields now home to the campus. GC's upcoming redevelopment project will build upon relationships established and maintained during its first five cleanup grants and bring in new community partners. GC solicits input from local organizations such as those described in Table 2) Partnerships. The partners were chosen to ensure the proposed redevelopment will: 1) improve the health and welfare of town residents, and 2) improve the economic conditions of the region.

Table 2) Partnerships

Partner Name	Point of contact (name/email/phone)	Specific role in project
Connecticut	Mary Ellen Dombrowski, President	Lend support from the East
River Valley	maryellen@crvchamber.org	Hartford business community. Host
Chamber of	(860) 659-3587	project presentations
Commerce		
Riverside Magnet	Jasdeep Singh, Principal	Communicate with parents, staff
School	jsingh@riversidemagnetschool.org; (860)	about the project; host meetings for
	709-6800	periodic updates as needed
Capitol Region	Lyle Wray, Executive Director	Share site clean-up and
Council of	lwray@crcog.org	redevelopment information with
Governments-	(860) 522-2217 ext. 4232	Sustainable Knowledge Corridor
Knowledge		consortium partners (regional
Corridor		planning agencies, municipalities,
		educational institutions and other
		community partners, including
		United Way and Chambers of
		Commerce) during regularly
		scheduled Sustainable Communities
		Planning Meetings.

¹⁴ East Hartford Plan of Conservation and Development (2014).

¹⁵ Connecticut Department of Labor. WARN Notices filed 2013-2018.

¹⁶ East Hartford Crime Statistics, 2017 and 2018. East Hartford Police Department.

		Research street-transit enhancements to identify improvements to offer easier, more convenient public transportation to the Goodwin College expanded
	D D III	Publicize project to association,
Carriage Park Apartments Association	Roger Bousquet, President phone: (860) 569-0322	host informational meetings to update progress of remediation plan

ii. Incorporating Community Input. Throughout the planning for the brownfield redevelopment project, GC will continue to seek input from the wider community in a variety of public venues. Todd Andrews, Senior VP for Strategic and Economic Development, will share GC's plans for this project and Main Street with the town's stakeholders at Town Council public meetings, the East Hartford Economic Development Council, and the Capital Region Development Authority meetings. He will make regular presentations to the Connecticut River Valley Chamber of Commerce and other civic groups including regional Rotaries, Lions Clubs and YMCAs to share updates, future plans and seek input. To ensure the community-at-large is informed about the project and to gain their feedback, GC will host community meetings with residents and keep information on its website up-to-date. GC expansion is also reported in local and state papers. Andrews regularly reports to the GC Board of Trustees and the Foundation Board of Trustees, as well as updating GC faculty and staff at mandatory "Community Days" held three times yearly. He also addresses the GC academic chairs and department heads during GC Leadership Council meetings. Articles are included twice annually in the GC online e-newsletter shared with all faculty, students and staff (via email blast and on its website).

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS A. Proposed Cleanup Plan-The goals and objectives of the proposed remediation include:

- A reduction in contaminant concentrations using financially viable methods that have demonstrated success in treating the contaminants of concern (COCs), while protecting public health and the environment.
- Minimally, soil quality for the site should comply with applicable CT Remediation Standard Regulations (RSRs) criteria including the Residential Direct Exposure Criteria (RDEC) and the Pollutant Mobility Criteria applicable to sites where groundwater is classified (GB PMC), and groundwater quality should comply with the applicable Surface Water Protection Criteria (SWPC) and Residential Volatilization Criteria (RVC).
- Removal and/or encapsulation of asbestos containing materials that are protective of public health and the environment.
- Building reconstruction/renovation using methods that are protective of human health and the environment.
- Remediation activities, as defined in the CT RSRs, should be initiated within reasonable timeframes and should be completed to allow occupancy of the property and final verification of the site within the timeframes required by the owner; and
- Remediation activities should be performed in such a way as to not significantly disturb site usage.



Proposed Remedial Actions

Remedial actions have been developed to remediate the soils above applicable remedial criteria in Areas of Concern (AOCs) as identified in the Phase III Environmental Site Assessment prepared by Zuvic Carr, licensed environmental professionals, in December of 2018 and in the Draft Remedial Action Plan prepared by Zuvic Carr dated Jan. 7, 2019.

AOC 2 and 3: East Hartford Tire (EHT) Service Bays and In-Grounds Lifts: In accordance with US EPA policies and procedures for presumptive remedies, excavation and offsite disposal of contaminated soil is the proposed presumptive remedy for these release areas. The remedial excavations will be guided by field screening of the soils with photoionization detector (PID) and visual observations. Confirmation soil samples will be collected from the extents of the excavations, including bottom and sidewall samples, and analyzed for ETPH and/or arsenic to confirm whether all soils above applicable remedial criteria have been removed. Soil in the ETPH excavation in bay 4 will be removed from below the groundwater table. Dewatering may be required during this remedial excavation and any wastewater discharge will be properly permitted and disposed of offsite.

AOCs 15 and 19: On-Site Dumpsters and Former On-Site Tobacco Barn and Agricultural Activities: In accordance with US EPA policies and procedures for presumptive remedies, excavation and offsite disposal of contaminated soil is the proposed presumptive remedy for these release areas. The remedial excavations will be guided by field screening of the soils with PID and visual observations. Confirmation soil samples will be collected from the extent of the excavations, including bottom and sidewall samples, and analyzed for ETPH, lead, pesticides, and/or PAHs to confirm whether all soils above applicable remedial criteria have been removed. Additional soil borings will be advanced and the need for any additional remediation in this area will be evaluated upon completion of the sampling and testing.

AOC 16: On-Site Catch Basins/Drywells and Former Storm Drains: Remedial action for AOC 16: In accordance with US EPA policies and procedures for presumptive remedies, excavation and offsite disposal of contaminated soil is the proposed presumptive remedy for these release areas. The remedial excavations will be guided by field screening of the soils with the PID and visual observations. Confirmation soil samples will be collected from the extent of the excavations, including bottom and sidewall samples, and analyzed for ETPH, lead, nickel, copper and/or zinc to confirm whether all soils above applicable remedial criteria have been removed.

Remedial action for ACM: Regulated friable and non-friable asbestos containing material (ACM) will be removed prior to any demolition or renovation activities that disturb ACM. It is anticipated that building renovations will likely involve disturbing all of the areas where ACM is present, so all ACM will likely be removed and disposed offsite. The work will be undertaken in accordance with National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and Occupational Safety and Health Administration (OSHA) requirements. A Connecticut Licensed Asbestos Contractor (LAC) will be retained to complete the work, which will be overseen by a Connecticut Licensed Asbestos Project Monitor (LAPM). The LAPM will complete periodic air monitoring and a final visual inspection and re-occupancy air monitoring prior to occupancy of the building. The LAC will submit a notice of asbestos abatement to the Connecticut Department of Public Health at least 10 days prior to the start of abatement.

B. Description of Tasks and Activities

Task 1-Cooperative Agreement Oversight: This task involves oversight of grant activities. Bryant Harrell, Vice President for Physical Facilities and IT, will serve as Project Director and oversee the implementation, including personnel assignment, financial management, coordination, EPA reporting, and stakeholder reporting. College Architect Antonio Matta will assist Harrell with project management. Harrell will spend a total of 72 hours at \$77.66 per hour for a total of \$5,591.52. Matta will spent 72 hours at an hourly rate of \$38.25 for a total of \$2,754. GC's Grants Officer Christopher G. Blake will spend 120 hours at \$35.53/hour for a total of \$4,263.60 to create and submit quarterly reports, MBE/WBE /DBE reporting, and ACRES updates, with Harrell and LEP guidance.

Task 2-Community Outreach & Engagement: GC will continue to reach out to community officials and residents to solicit input and give updates on project progress. GC's communications director, Phil Moore (media relations coordinator Rob Muirhead as back-up), will use established communications channels and develop and monitor new ones to ensure stakeholders and constituents are informed about all stages of cleanup and redevelopment in a timely manner. Combined, they will spend 48 hours at an average \$50.52/hour, totaling \$2,424.96. The EPA request is \$415,272.90 with a GC cost share of \$83,054.58. GC requests \$500.00 for communications-related supplies and materials including paper, printing of community notification posters and signage at the site.

Task 3-Site-Specific Activities: A licensed environmental engineering firm will oversee activities of an excavation contractor to remove soil from up to 10 areas where soil exceeds remedial criteria. Prior to excavation, an evaluation of the feasibility of monitored natural attenuation for groundwater cleanup, and pre-characterization of soil for off-site disposal will be completed. Following excavation, confirmation soil samples and multiple rounds of groundwater will be collected/tested to demonstrate compliance with remedial criteria. Following demonstration of compliance, detailed reports will be prepared for submission to EPA. Asbestos will be removed from the building by a licensed asbestos abatement contractor with oversight by a licensed asbestos monitor. Petroleum removal costs are \$116,193; hazardous substance costs are \$239,328

Task 4-Oversee Site Cleanup: Harrell will provide management and oversight of contractors, including procurement and contracting. He will ensure all deliverables related to the clean-up tasks are executed in a timely, complete, and safe manner, and that all reporting is completed on time and to the satisfaction of EPA standards. He will spend 72 hours over the life of the grant at average of \$77.66/hour for a total of \$5,591.52. Matta will assist with oversight and management of the cleanup for a total of 216 hours at an hourly rate of \$38.25 for a total of \$8,262. The EPA request is \$415,272.90; GC's cost share is \$83,054.58—both include fringe benefits.

C. Cost Estimate and Outputs

Table 3) Budget for 339 Main Street

Programmatic	Task 1-	Task 2-	Task 3-Site-	Task 4-	Total
cost only	Cooperative	Community	Specific	Oversee Site	1
·	Agreement	Outreach &	Activities	Cleanup	
	Oversight	Engagement			
Personnel	12,609	2,425		13,854	28,888
Fringe Benefits	3,531	679		3,879	8,099
Travel-1	2,000				2,000
Equipment-2					
Supplies	500	500			1,000
Contractual-			\$116,193		\$116,193
Petroleum					
Contractual-			\$239,328		\$239,328
Hazardous					
Substances					
Administrative	\$19,775				\$19,775
costs-3					
Cost Share-4					\$83,057
Total					\$498,330

- 1 Travel to brownfields-related training conferences is an acceptable use of these grant funds.
- 2 EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for Brownfield Grants.
- 3 Administrative costs (direct and/or indirect) cannot exceed 5% of the total EPA-requested funds.
- 4 Applicants must include the cost share in the budget even if applying for a cost share waiver (see Section III.B.13. for a list of applicants that may request a cost share waiver). If the applicant is successful and the cost share waiver is approved, it will be removed in pre-award negotiation.

D. Measuring Environmental Results-The success of the remediation will be measured by demonstrating compliance with the CT RSRs. The applicable soil remedial criteria in the RSRs are the RDEC and the GB PMC. Compliance with these criteria will be demonstrated by testing sidewall and bottom samples from the limits of the remedial excavations for appropriate constituents of concern, in accordance with applicable guidance developed by the CT DEEP. The applicable groundwater remedial criteria are the SWPC and the RVC. Compliance with both sets of criteria will be demonstrated with groundwater samples collected quarterly during times reflective of seasonal variability during a period of one to two years following remediation and return to steady-state conditions.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

A. Programmatic Capability

Organizational Structure: GC's experienced staff has the resources necessary to successfully carry out brownfield grant management. Harrell, the Vice President for Physical Facilities and IT, will be responsible for project oversight, including competitive bidding, selection, and managing contractors undertaking brownfields work. He has overseen the brownfield cleanups and construction of all GC's buildings on the new campus. He managed the three EPA Brownfield grants totaling \$600,000 for petroleum cleanup on 40 acres of GC property, now

home to GC's main campus buildings and magnet school. Harrell has extensive experience in procurement procedures, Requests for Qualifications/ Proposals, contract negotiations, contract management, and prevailing wage requirements. Andrews and Harrell currently manage \$10.3 million in capital projects and \$495,175 in consultants' contracts associated with those projects. College Architect Matta will provide day to day management support and Grants Officer Blake will assist with filing reports to EPA. Both will report to Harrell.

Acquiring Additional Resources: GC has the resources to hire staff and qualified contractors to complete the project. GC's HR department advertises positions and conducts initial applicant screening. HR interviews qualified applicants to evaluate their competencies, experience and fitness for positions. GC has worked with a variety of licensed construction and engineering contractors during the development and expansion of its main campus.

B. Past Performance and Accomplishments

i. Currently has/previously received an EPA Brownfields Grant: GC has been a highly successful EPA grantee. In 2008, GC was awarded three (3) \$200,000 grants for a total of \$600,000 for 40 acres of petroleum cleanup at 1-5, 133, 195 Riverside Drive. EPA combined the three grants into two awards: BF-97192201-0 and BF-97192101-0. The sites are cleaned, the work done within budget, and the grants are closed. The cleanup preceded the construction of the GC River Campus main building and supporting structures as well as one magnet high school. The only variance: BF 97192201 had a six-month extension due to wet ground as a result of a recordbreaking annual snowfall.

1.) Accomplishments: This first campus project leveraged \$100,000 EPA Brownfields Assessment funding provided by the MetroHartford Brownfield Assessment Grant Program for Phase I, II, and III assessments. It led to the demolition of more than 30 above-ground oil tanks and other defunct industrial installations and management of hazardous materials and petroleum in soil. Through its public-private partnerships, GC completed the extensive site remediation and opened its 109,000 square-foot academic center in late 2008 as the first phase of developing a new campus on the riverfront. On Sept. 12, 2013, the EPA awarded GC with a three-year grant totaling \$480,000 to clean up hazardous waste and petroleum at 361-363 Main Street and 365-367 Main Street in East Hartford, CT (BF 96176901). A September 15, 2014 start date was planned with a January, 2015 completion date. As of December 2014, cleaning was completed. Testing and monitoring was conducted according to schedule. Site remediation (i.e. excavation and off-site disposal) was completed in December 2014. Post remediation groundwater monitoring was completed in July 2016. The project was completed within budget. Construction of the Connecticut River Academy, an environmentally-themed magnet high school serving 480 was completed on a site cleaned with funds from the 2008 EPA grant. A multi-use river walking trail has also been opened on the property.

Recognition: These three projects earned GC recognition at the federal, regional and state levels, including a 2012 EPA Environmental Merit Award and 2010 Northeast Economic Development Association Project of the Year, and are often-cited by EPA Region 1 as a cleanup best practices project. The CT DEEP recognized GC for smart growth.

2.) Compliance with Grant Requirements: GC complied with all grant requirements. The college received official notice from EPA of the closeout of this grant on Jan. 11, 2017.

Attachment A- Threshold Criteria

Goodwin College EPA Brownfields Cleanup Grant Application

- 1. Applicant Eligibility
 Goodwin College is a 501(c)(3) not-for-profit entity. IRS determination letter is
- 2. Previously Awarded Cleanup Grants
 - GC has been a highly successful EPA grantee. In 2008, GC was awarded three (3) \$200,000 grants for a total of \$600,000 for 40 acres of petroleum cleanup at 1-5, 133, 195 Riverside Drive. EPA combined the three grants into two awards: BF-97192201-0 and BF-97192101-0. The sites are cleaned, the work done within budget, and the grants are closed. The cleanup preceded the construction of the GC River Campus main building and supporting structures as well as one magnet high school. The only variance: BF 97192201 had a six-month extension due to wet ground as a result of a record-breaking annual snowfall.
 - On Sept. 12, 2013, the EPA awarded GC with a three-year grant totaling \$480,000 to clean up hazardous waste and petroleum at 361-363 Main Street and 365-367 Main Street in East Hartford, CT (BF 96176901). A September 15, 2014 start date was planned with a January, 2015 completion date. As of December 2014, cleaning was completed. Testing and monitoring was conducted according to schedule. Site remediation (i.e. excavation and off-site disposal) was completed in December 2014. Post remediation groundwater monitoring was completed in July 2016. The project was completed within budget.

The site at 339 Main Street has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

- 3. Site Ownership
 - Goodwin College, through its affiliate, River Campus, Inc., took title to 339 Main Street, East Hartford through a foreclosure sale. Title was conveyed in the form of the Committee Deed recorded in the East Hartford Town Clerk's Office on Nov. 3, 2017.
- Basic Site Information: (a) the name of the site; East Hartford Tire, (b) the address of the site, including zip code; 339 Main Street, East Hartford, CT 06118 (.0.82 acre), (c) the current owner of the site: Goodwin College (purchased 11/3/17).
- 5. Status and History of Contamination at the Site: Identify:
 - (a) whether this site is contaminated by petroleum or hazardous substances:

Petroleum & Hazardous Substances

(b) the operational history and current use(s) of the site:

Former plating facility, auto body and automotive repair garage, closed in 2017.

(c) environmental concerns, if known, at the site:

Soil and groundwater contamination from former site operations; asbestos in interior of building.

(d) how the site became contaminated, and to the extent possible, describe the nature and extent of the contamination:

Releases related to historic plating operation spills, leaking UST systems, on-site petroleum spills, asbestos in interior of building.

6. Brownfield Site Determination

To be eligible for brownfields funding, sites must meet the definition of a brownfield under CERCLA. The following types of properties are not eligible for brownfields funding:

Affirm that the site is:

(a) not listed or proposed for listing on the National Priorities List:

Affirmed.

(b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA: Affirmed

(c) not subject to the jurisdiction, custody, or control of the U.S. government:

Affirmed.

- 7. Environmental Assessment Required for Cleanup Proposals. A written ASTM E1903-11 or equivalent Phase II site assessment report (a draft report is sufficient) must be completed prior to proposal submission. Equivalent reports would include site investigations or remedial action plans developed for a state cleanup program or Office of Surface Mining surveys for mine-scarred lands.
 - Describe the type of environmental assessments conducted at your proposed site (do not attach assessment reports).
 - Provide the date of the Phase II or equivalent report.

History: Phase I ESA conducted by Zuvic, Carr and Associates, Inc. (Zuvic Carr) in January 2012 on behalf of Goodwin College; Phase II ESA conducted by Zuvic Carr on behalf of Goodwin College August 2012. Phase I Environmental Site Assessment Update report conducted by Zuvic Carr in December of 2017. New Phase III Environmental Site Assessment Report update, prepared by Zuvic Carr, December 2018. Draft Remedial Action Plan completed by Zuvic Carr and submitted to Goodwin on Jan. 7, 2019.

8. Enforcement and Other Actions.

Identify known ongoing or anticipated environmental enforcement or other actions related to the site for which brownfields funding is sought. Provide information on any inquiries, or orders from federal, state, or local government entities that the applicant is aware of regarding the responsibility of any party (including the applicant) for the contamination, or hazardous substances at the site, including any liens. The information

provided in this section may be verified, and EPA may conduct an independent review of information related to the applicant's responsibility for the contamination or hazardous substances at the site.

No enforcement action has been taken related to this site.

9. Sites Requiring a Property-Specific Determination

Property Specific Determination

The following special classes of property require a "Property-Specific Determination" from EPA to be eligible for brownfields funding:

Properties subject to planned or ongoing removal actions under CERCLA;

Properties with facilities that have been issued or entered into a unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under the Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA);

Properties with facilities subject to RCRA corrective action (§3004(u) or §3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures;

Properties that are land disposal units that have submitted a RCRA closure notification or that are subject to closure requirements specified in a closure plan or permit; Properties where there has been a release of polychlorinated biphenyls (PCBs) and all or part of the property is subject to TSCA remediation; and

Properties that include facilities receiving monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund (see Appendix 1 for a definition of LUST Trust Fund sites).

This site is not subject to a property specific determination.

10. Threshold Criteria Related to CERCLA/Petroleum Liability
Applicants eligible for brownfields funding cannot be liable for contamination on the site.
Site eligibility related to liability is determined differently at sites contaminated with hazardous substances than for sites contaminated by petroleum or petroleum product.

If the site is a hazardous substance site, please respond to all the items under (a). If the site is a petroleum site, please respond to all the items under (b), including the requirement to provide a petroleum determination letter.

If the site is co-mingled with hazardous substances and petroleum contaminants, determine whether the predominant contaminant is hazardous substances or petroleum, and respond to the corresponding items (as noted above).

If applying for hazardous substances and petroleum funding at the same site, and the hazardous substances and petroleum contaminated areas of the site are distinguishable,



the proposal must respond to all the items under (a) and (b), including the requirement to provide a petroleum determination letter.

- (a) Property Ownership Eligibility Hazardous Substance Sites
 To be eligible for a Brownfields Cleanup Grant to address contamination at a brownfields property, eligible entities who fall within one of the categories of potentially liable parties must demonstrate that they meet one of the liability protections or defenses set forth in
- CERCLA by establishing that they are:
- (1) an innocent landowner: Affirmed(2) a bona fide prospective purchaser (BFPP);
- (3) a contiguous property owner; or
- (4) a local or state government entity that acquired the property involuntarily through bankruptcy, tax delinquency, or abandonment, or by exercising its power of eminent domain. To claim protection from liability as an innocent landowner, bona fide prospective purchaser, or contiguous property owner, property owners, including state and local governments, must conduct all appropriate inquiries prior to acquiring the property. (Please note that these requirements apply to all property acquisitions, including properties acquired by donation or title transfer at zero cost.)

Information on the Property Acquisition You may combine responses to the following into one response, though please be sure to answer each item fully. Provide information on:

- i) how you acquired or will acquire ownership (e.g., by negotiated purchase from a private individual, by purchase or transfer from another governmental unit, by foreclosure of real property taxes, by eminent domain, or other (describe);
- ii) the date you acquired the property;
- iii) the nature of your ownership (fee simple) (note that you must have sole ownership of the site to be eligible for funding; unless EPA approves a different ownership arrangement);
- iv) the name and identity of the party from whom you acquired ownership (i.e., the transferor); and
- v) all familial, contractual, corporate, or financial relationships or affiliations you have or had with all prior owners or operators (or other potentially responsible parties) of the property (including the person or entity from which you acquired the property).

Goodwin College, through its affiliate, River Campus, Inc., took title to 339 Main Street, East Hartford through a foreclosure sale. Title was conveyed in the form of the Committee Deed recorded in the East Hartford Town Clerk's Office on Nov. 3, 2017. Title is free and clear of all previous encumbrances, which were extinguished by the foreclosure judgment. The property was not a part of the Viggiano bankruptcy estate at the time of the transfer of title. Therefore, the Viggiano bankruptcy proceedings had no effect on the acquisition of the property.

b. Timing and/or Contribution Toward Hazardous Substances Disposal Identify whether all disposal of hazardous substances at the site occurred before you acquired the property and whether you caused or contributed to any release of hazardous substances at the site. Affirmed.

Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site. **Affirmed.**

- c. Pre-Purchase Inquiry Describe any inquiry by you or others into the previous ownership, uses of the property, and environmental conditions conducted prior to taking ownership. Please include the items below in your description.
- i) The types of site assessments performed (e.g., ASTM E1527-13 Phase I), the dates of each assessment, and the entity for which they were performed (state whether the assessment was performed specifically for you, or if not, the name of the party that had the assessment performed and that party's relationship to you). Please note that to be eligible for a Brownfields Grant, parties who may be potentially liable under CERCLA (which includes current owners of the property) must demonstrate they are not liable for contamination at the property. In most cases, this demonstration must include evidence that an AAI investigation, or Phase I Environmental Site Assessment in compliance with ASTM E1527-13 (or ASTM E2247-16) was conducted prior to property acquisition.

Phase II ESA conducted by Zuvic Carr and Associates, Inc. (Zuvic Carr) in January 2012 on behalf of Goodwin College; Phase I ESA conducted by Zuvic Carr December 2017, Phase III ESA conducted by Zuvic Carr on behalf of Goodwin College dated December 2018.

ii) Who performed the AAI investigation or Phase I environmental site assessments and identify his/her qualifications to perform such work.

Goodwin College has procured the services of a Licensed Environmental Professional company, Zuvic Carr, who has performed assessment work on all the campus properties. They are also responsible for preparing Remedial Action Plans, securing regulatory approvals and overseeing and certifying cleanup work meets state and federal regulatory standards. They are licensed by the State of Connecticut Department of Energy & Environmental Protection to perform such work. Through this process, the college has enrolled in the State's Voluntary Cleanup program. In the hiring of additional technical expertise, the college will be consistent with the competitive procurement provisions of 40 CFR Part 30 and will ensure that the technical services will be in place prior to beginning cleanup activities.

iii) If the original AAI investigation or Phase I environmental site assessment was conducted more than 180 days prior to the date you acquired the property, affirm that you

conducted the appropriate updates in the original assessment within 180 days prior to your acquisition of the property in order to take advantage of the bona fide prospective purchaser, innocent landowner, or contiguous property owner provision.

The Phase II Assessment report is dated December of 2017, but the work was substantially completed by November of that year.

d. Post-Acquisition Uses. Describe all uses of the property since you acquired ownership through the present, including any uses by persons or entities other than you. Please provide a timeline with the names of all current and prior users during the time of your ownership; the dates of all uses; the details of each use, including the rights or other reason pursuant to which the use was claimed or taken (e.g., lease, license, trespass); and your relationship to the current and prior users.

1966-2017 – automotive tire garage; 1982-1992 – site also occupied by Component Finishing, Inc., a plating facility; 1982-1992 – site also occupied by Jim's Auto (an auto body shop). The site is not being used at the present time.

- e. Continuing Obligations. Describe in detail the specific appropriate care that you exercised with respect to hazardous substances found at the site by taking reasonable steps to:
- i) stop any continuing releases; Plating facility vacated site in 1992
- ii) prevent any threatened future release; and
- iii) prevent or limit exposure to any previously released hazardous substance.

Please confirm your commitment. Goodwin Affirms

- i) comply with all land-use restrictions and institutional controls;
- ii) assist and cooperate with those performing the cleanup and provide access to the property;
- iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- iv) provide all legally required notices.

11. Cleanup Authority and Oversight Structure

a. Describe how you will oversee the cleanup at the site. Indicate whether you plan to enroll in a state or tribal response program. If you do not plan to enroll in a state or tribal response program, or an appropriate state or tribal response program is not available, you will be required to consult with EPA to ensure the cleanup is protective of human health and the environment. Therefore, if you do not plan to enroll in a state or tribal response program, provide a description of the technical expertise you have to conduct, manage, and oversee the cleanup and/or whether you plan to acquire additional technical expertise. If you do plan to acquire additional expertise, discuss how you will comply

with the competitive procurement provisions of 2 CFR Section 200.317 through 200.326 and ensure the technical expertise is in place prior to beginning cleanup activities.

Management and oversight of contractors, including procurement and contracting, will be managed by Bryant Harrell. He will ensure all deliverables related to the clean-up tasks are executed in a timely, complete, and safe manner. He will ensure that all reporting is completed on time and to the satisfaction of EPA standards.

GC has retained a Licensed Environmental Professional, Robert Carr of Zuvic Carr, who has performed assessment work on all campus properties and is responsible for preparing Remedial Action Plans, securing regulatory approvals, overseeing cleanup work, and certifying that cleanup work meets state and federal regulatory standards, and help develop the RAP and ABCA. Mr. Carr serves as principal in charge of environmental projects at Zuvic Carr. He has more than 24 years of experience as an environmental engineer and consultant working for private sector clients, as well as local and state agencies in Connecticut, New York, and Rhode Island.

GC has an established procurement policy to secure bids and make contract awards and is prepared to identify and contract with additional consultants as needed per the federal and state procurement laws. GC affirms that it will adhere to all competitive Procurement standards and regulations including 40 CFR Parts 30 or 31 and 40 and 40 CFR Part 30 or 40 CFR. GC assures EPA that all technical expertise will be in place prior to beginning cleanup activities.

b. Cleanup response activities often impact adjacent or neighboring properties. For example, access to neighboring properties may be necessary to conduct the cleanup, perform confirmation sampling, or monitor offsite migration or contamination. If this type of access is needed, provide your plan to acquire access to the relevant property(ies).

We will not require access to other properties in proximity to 339 Main Street.

12. Community Notification

The applicant must provide the community with notice of its intent to apply for an EPA Brownfields Cleanup Grant and allow the community the opportunity to comment on the draft proposal. The community notification ad (or equivalent), public meeting, and other requirements discussed below must be current and related to this specific proposal. Failure to demonstrate community notification will result in disqualification of the proposal.

a. Draft Analysis of Brownfield Cleanup Alternatives

The applicant must allow the community to comment on the draft proposal, which must include an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA). The

draft ABCA must briefly summarize information about: the site and contamination issues, cleanup standards, and applicable laws; the cleanup alternatives considered (for each alternative and the alternative chosen include information on the effectiveness, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness and; the proposed cleanup.

b. Community Notification Ad

The applicant must publish a community notification ad in the local newspaper or an equivalent means customarily used to communicate to the target community(ies) no later than January 17, 2019. The community notification ad (or equivalent) must clearly state: that a copy of this grant proposal, including the draft ABCA, is available for public review and comment; how to comment on the draft proposal; where the draft proposal is located, and the date and time of a public meeting (must be held prior to submittal of this proposal).

The attached community notification was published in The Hartford Courant and The East Hartford Gazette, as well as the Goodwin College weekly e-newsletter, which goes to all faculty and staff members.

c. Public Meeting

The applicant must hold a public meeting to discuss the draft proposal and consider public comments prior to submittal of this proposal. From the meeting, the applicant must produce: the comments or a summary of the public comments received; the applicant's response to those comments; meeting notes or a summary of the public meeting; and meeting sign-in sheets.

A Public Meeting was held on Monday, Jan. 14, 2019, beginning at 5:00 p.m. in the Community Room at Goodwin College. There were no comments. The minutes are attached.

d. Submission of Community Notification Documents

The applicant must attach the items listed below to the proposal submitted to EPA: a copy of the draft ABCA; a copy of the ad (or equivalent) that demonstrates notification to the public and solicitation for comments on the proposal; the comments or a summary of the comments received; the applicant's response to those public comments; meeting notes or a summary from the public meeting; and meeting sign-in sheets.

A copy of the ad, the sign-in sheet, and the minutes are attached.

13. Statutory Cost Share

Cleanup Grant recipients are required to provide a cost share that is calculated at 20% of the total federal cleanup funds awarded. For example, if EPA awards you \$200,000 of federal cleanup funds, you must provide a cost share of an additional \$40,000. The cost

20

share may be in the form of a contribution of money, labor, material, or services from a non-federal source.

- a. Demonstrate how you will meet the required cost share, including the sources of the funding or services, as required for this Cleanup Grant.
- b. If you are requesting a hardship waiver of the cost share, provide an explanation for the basis of your request.

Goodwin College is committed to meeting the cost share through college funds. Goodwin staff has vast experience in managing past EPA Brownfields grants. The Vice President of Facilities and Information Technology will be the project director and the College Architect will be the project manager. The Grants Office will coordinate with the project director on the filing of all performance and financial progress reports, as well as updating information on the ACRES site.



79 Elm Street • Hartford, CT 06106-5127

www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

January 29, 2019

Mr. Christopher G. Blake, Grants Officer Goodwin College 1 Riverside Drive East Hartford, CT 06118

RE: Determination of Eligibility for Brownfields Petroleum Assessment Funding 339 Main St., East Hartford, Conn. (the "Site")

Dear Mr. Blake:

The Department of Energy and Environmental Protection (DEEP) has reviewed a request dated December 19, 2018 (the "Application") from Goodwin College (the "Applicant") requesting that DEEP provide a Brownfields Petroleum Eligibility Determination for the Site.

The Applicant is seeking this determination in support of its application to the US Environmental Protection Agency (EPA) for a brownfields cleanup grant for federal fiscal year 2019. Based on the information you provided to DEEP and on other sources, DEEP has determined the following:

- 1. The Site is of "relatively low risk" compared with other petroleum-only sites in the state;
- 2. The Site is not subject to a RCRA Corrective Action Order under Section 9003(h);
- 3. The Site is not subject to any federal or state enforcement action; and
- 4. The Site is not listed on the EPA National Priority List.

The Site is currently owned by River Campus, Inc., which is an affiliate of Goodwin College. River Campus Inc. acquired the Site on November 3, 2017 from the immediate past owner, Joseph M. Viggiano, *et al* through foreclosure of a lien. The Application indicates that the immediate past owner has filed for bankruptcy.

The Site was previously used as an auto repair facility, an auto body shop and a metal plating facility. According to the Application, petroleum was released from several sources on the Site while the Site was used by previous owners as an auto repair shop and auto body shop. The sources from which the petroleum was released include motor oil and waste oil storage areas, leaking hydraulic lifts, and leaks or spills from

Mr. Christopher G. Blake

Re: Petroleum Determination- 339 Main St., East Hartford

Page 2 of 2

aboveground storage tanks and service bays. DEEP therefore considers the immediate past owner to be liable for petroleum contamination present on the Site as a result of activities that occurred while the immediate past owner owned the Site. The current owner acquired the Site through foreclosure of a lien, and the immediate past owner has filed for bankruptcy, so DEEP does not consider the immediate past owner to be financially viable.

In accordance with EPA policy, DEEP considers the acquisition of the Site by the current owner through foreclosure of a lien to be an involuntary taking of the Site. DEEP generally does not consider the owners of property that acquire the property through an involuntary taking to be liable. DEEP therefore does not consider the current owner of the Site to be liable. In addition, in August, September and October 2018 the current owner removed hydraulic lifts, tank reservoirs and piping from the Site, together with 22 cubic yards of petroleum- contaminated soil.

Based on the above determinations that were made in accordance with current DEEP Petroleum Eligibility Determination Guidance (dated June 17, 2015), the Site is eligible for petroleum funding from EPA.

Determinations made in this letter pertain solely to the Brownfields Petroleum Eligibility Determination and are not meant to determine liability for pollution on or emanating from the Site, or the financial condition of any party for any other purpose.

If you have any questions, please contact me at (860) 424-3768.

Sincerely,

Mark R. Lewis

Think R. Lines

Brownfields Coordinator

cc: Dorrie Paar, US EPA (via e-mail)

Rob Robinson, DEEP (via e-mail)

Claire Quinn, DEEP (via e- mail)

DEPARTMENT OF THE TREASURY

INTERNAL REVENUE SERVICE . O. BOX 2505 INCINNATI, OH 45201

Date: JAN 3 1 2002

TEW GOODWIN COLLEGE INC 145 EURNSIDE AVE EAST HARTFORD, CT 06108 Employer Identification Number:
05-1627882

DiN:
17053347053031

Contact Person:
ZENTA LUK

Contact Telephone Number:
(877) 829-5500

Accounting Period Ending:
September 30

Form 990 Required:
Yes

Addendum Applies:

ear Applicant: ,.

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined out are exempt from federal income tax under section 501(a) of the Internal evenus Code as an organization described in section 501(c)(3).

We have further determined that you are not a private foundation within he meaning of section 509(a) of the Code, because you are an organization escribed in sections 509(a)(1) and 170(b)(1)(A)(ii).

If your sources of support, or your purposes, character, or method of peration change, please let us know so we can consider the effect of the change on your exempt status and foundation status. In the case of an amendant to your organizational document or bylaws, please send us a copy of the mended document or bylaws. Also, you should inform us of all changes in your ame or address.

As of January 1, 1984, you are liable for taxes under the Federal neurance Contributions Act (social security taxes) on remuneration of \$100 r more you pay to each of your employees during a calendar year. You are liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you are not subject to the excise axes under Chapter 42 of the Code. However, if you are involved in an excess enefit transaction, that transaction might be subject to the excise taxes of action 4958. Additionally, you are not automatically exempt from other ederal excise taxes. If you have any questions about excise, employment, or ther federal taxes, please contact your key district office.

Grantors and contributors may rely on this determination unless the nternal Revenue Service publishes notice to the contrary. However, if you use your section 509(a)(1) status, a grantor or contributor may not rely this determination if he or she was in part responsible for, or was aware to the act or failure to act, or the substantial or material change on the

Letter 947 (DO/CG)

JEW GOODWIN COLLEGE INC

part of the organization that resulted in your loss of such status, or if he or she acquired knowledge that the Internal Revenue Service had given notice that you would no longer be classified as a section 509(a)(1) organization.

Donors may deduct contributions to you as provided in section 170 of the Code. Requests, legacies, devises, transfers, or gifts to you or for your use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of Code sections 2055, 2106, and 2522.

Contribution deductions are allowable to donors only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstantes. See Revenue Ruling 67-246, published in Cumulative Bulletin 1567-2, in page 164, which sets forth guidelines regarding the deductibility, as charitable contributions, of payments made by taxpayers for admission to or other participation in fundraising activities for charity.

In the heading of this letter we have indicated whether you must file Form 190. Return of Organization Exampt From Income Tax. If Yes is indicated, you are required to file Form 990 only if your gross receipts each year are normally more than \$25,000. However, if you receive a Form 990 package in the mail, please file the return even if you do not exceed the gross receipts test. If you are not required to file, simply attach the label provided, check the rox in the heading to indicate that your annual gross receipts are normally 125,000 or less, and sign the return.

If a return is required, it must be filed by the 15th day of the fifth the touth after the end of your annual accounting period. A penalty of \$20 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$10,000 or i percent of your gross receipts for the year, whichever is less. For inganizations with gross receipts exceeding \$1,000,000 in any year, the penalty is \$100 per day per return, unless there is reasonable cause for the delay. The maximum penalty for an organization with gross receipts exceeding \$1,000,000 shall not exceed \$50,000. This penalty may also be charged if a seturn is not complete, so be sure your return is complete before you file it.

You are required to make your annual information return, Form 990 or form 930-BZ, available for public inspection for three years after the later of the due date of the return or the date the return is filed. You are also required to make available for public inspection your exemption application, my supporting documents, and your exemption letter. Copies of these required are also required to be provided to any individual upon written, or in terson request without charge other than reasonable fees for copying and instage. You may fulfill this requirement by placing these documents on the Internet. Penalties may be imposed for failure to comply with these requirements. Additional information is available in Publication 557, lax-Exempt Status for Your Organization, or you may call our toll free number shown above.

Letter 947 (DO/CG)



You are not required to file federal income tax returns unless you are sject to the tax on unrelated business income under section 511 of the Code. You are subject to this tax, you must file an income tax return on Form 1-7. Exempt Organization Eusiness Income Tax Return. In this letter we are determining whether any of your present or proposed activities are unreled trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. an employer identification number was not entered on your application, a ther will be assigned to you and you will be advised of it. Please use that ther on all returns you file and in all correspondence with the Internal same Service.

Revenue Procedure 75-50, published in Cumulative Bulletin 1975-2 on page 7, sets forth guidelines and recordkeeping requirements for determining other private schools have racially nondiscriminatory policies as to idents. You must comply with this revenue procedure to maintain your rexempt status.

if distributions are made to individuals, case histories regarding the sipients should be kept showing names, addresses, purposes of awards, manner selection, relationship (if any) to members, officers, trustees or donors of ids to you, so that any and all distributions made to individuals can be estantiated upon request by the Internal Revenue Service. (Revenue Ruling 304, C.E. 1956-2, page 306.)

If we have indicated in the heading of this letter that an addendum lies, the enclosed addendum is an integral part of this letter.

Escause this letter could help resolve any questions about your exempt true and foundation status, you should keep it in your permanent records.

We have sent a copy of this letter to your representative as indicatefing power of attorney.

If you have any questions, please contact the person whose name and ephone number are shown in the heading of this letter.

Sincerely yours,

Steven T. Miller

Director, Exempt Organizations

Letter 947 (DO/CG)

Blue Hills fire commissioner used district credit card to buy gas for personal vehicle

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Goodwin College

BY STEVEN GOODE

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discontinued.

Think the whole thing's a travesty," said former Bloomfield Mayor Joan Gamble, a district resident who also questioned how the practice could ents without any documentation.

Massey-Greece also told that the did not believe for district craft and the district craft could be used to purchase lens as 18s and other shopping clubs, according to police documents.

But records show that Massey-Greece has used the district could to make thousands of olders in purchases at 31's and 50's & Sangapan, Sanga

district card to Stanley Streemer in Elcomfield in Angust that was marked as to be reinformered on a vocaber that was stagned by her and Jammai in Decommer. It is unclear if the charge has been refine the control of the control of the charge has been refined that of police office who was seen and the control of the cont

FBI concerned about money mules roped into fraud schemes

Associated Peas

WASHINGTON, D.C. —
The ennal crught the executive at a small company by surprise once morning in
2005. The company's owner, or so he thoraght, was recuesting a money transfer to pay for suppless from a new vendor.

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Notice of Public Meeting Goodwin College Campus Community Room, first floor One Riverside Drive East Hartford, CT 06118

Notice of Goodwin College's intent to apply for U.S. EPA Brownfields Cleanup Grant; Notice of a Public Meeting to discuss, accept and consider Public Comment on the Draft Grant Proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA); and Request for Public Comment on the Draft Grant Proposal and draft ABCA. Goodwin College intends to apply for a U.S.EPA Brownfields Cleanup Grants due on Jan. 31, 2019.

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Bryant Harrell, VP, Facilities and Information Technology Goodwin College One Riverside Drive East Hartford, CT 06118-1837 Email: bharrell@goodwin.edu

AROUND EAST HARTFORD

Aselton 5K Sunday, Hockey January 18

Traffic Advisory for all East Hartford residents and motorists planning to utilize the Long Hill Street area Sunday, January 6 from 1 to 2 p.m.

The 27th running of the Officer Brian Aselton memorial Snow Dash will be Sunday, January 6 starting at 1:30 p.m. at Langford School, 61 Alps Drive. Local roads will be closed to traffic for one hour starting at 1 p.m. to make way for a field of approximately 300 runners.

The timed, three mile Aselton Snow Dash finishes at the East Hartford Golf Course. Entry fee online is \$25 until January 5, but registration also takes place the morming of the race at Langford School.

Police will guide traffic around the race course and East Hartford Parks and Rec staff will supervise the race. Streets west of the East

Hartford Golf Course will be closed to traffic for approximately one hour during the road race. Closed will be Long Hill Street between Burnham and Goodwin, Leverich Drive, Drive, Alps Yale Drive, Goodwin Street (between Long Hill and University Avenue), Prestige Park Road, University Avenue, Colby Drive, Bay Path Drive, Andover Road, Temple Drive, Syracuse Drive, and Purdue Lane. For more information call the EHPD at 860-528-4401 or to regsiter as a runner go to:http://www.brianaselton.org/events.html

https://www.facebook.com/EH Parks/https://runsignup.com/R ace/CT/EastHartford/AseltonS nowDash

Trophies are awarded in many different divisions including a law enforcement division. Proceeds are divided evenly between Brian's scholarship fund and the East Hartford Police Department Quality of Life Program. The 2019 Snow Dash will be January 6, 2019.

On January 18 the Hartford Wolf Pack hockey game will also honoring Officer Aselton with all proceeds going to maintain the East Hartford Police Officer's memorial in front of the East Hartford public safety complex. The memorial includes the names of the three East Hartford police officers who made the ultimate sacrifice for East Hartford.

Before the puck is dropped West Hartford Police Captain Kevin McCarthy will sing the National Anthem.

FMI about the Hartford Wolf Pack hockey game or tickets contact East Hartford Police Officer Tom Castagna or Dispatcher Stacie Rosedale at 860-528-4401.

This January 23 will mark the 20th anniversary of Officer Aselton's sacrifice. An annual ceremony is held at the memorial at 31 School Street.

New websi find need

In recognition of the 701 anniversary of the Univers Declaration of Human Righ and in honor of 2018 Huma Rights Day, Connecticut's civelegal aid programs annound the redesign www.CTLawHelp.org, a websi providing on-line resources thelp Connecticut's low-incon residents find help for the legal problems.

The new version makes na igation easier and faster fi people to find information, ar is now mobile-friendly for us on handheld devices such a smartphones (e.g. iPhon Android) and tablets. The online information, how-fluides, referral resources, an practical tips on this websit can be powerful tools, whe people can't afford or locate lawyer to help with their leg problems. This website als provides an online applicatio

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NOTICE OF PUBLIC MEETING

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NOTICE OF PUBLIC MEETING - JANUARY 14

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Posted: Thursday, December 20, 2018

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The latest in Goodwin College student news, activities, events, clubs/organizations, and athletics!



PUBLIC MEETING — Goodwin College Goodwin College Proposal and ABCA Brownfield Clean-up 339 Main Street

Monday, Jan. 14, 2019, 5:00 p.m. Goodwin College – One Riverside Drive, East Hartford, CT – Community Room

Meeting Minutes

Goodwin College staff, Todd Andrews, Christopher Blake, Tony Matta, and Bruce Morton, were present. LEP Robert Carr was also present.

Available for review were the maps for the area to be redeveloped, ABCAs and draft proposals for the property.

No persons from the public attended.

Respectfully Submitted, Christopher Blake Grants Officer



PUBLIC MEETING - EPA Brownfields Cleanup Grant Application Goodwin College Proposal and ABCA Brownfield Clean-up for property at 339 Main Street, East Hartford, CT 06118

Goodwin College - One Riverside Drive, East Hartford, Community Room January 14, 2019, 5 p.m.

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Christopher Blake

From:

Goodwin College <goodwincollege@goodwin.ccsend.com> on behalf of Goodwin

College <communications@goodwin.edu>

Sent:

Monday, December 24, 2018 8:05 AM

To:

Christopher Blake

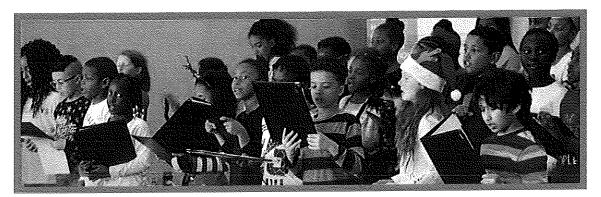
Subject:

This Week at Goodwin: Happy Holidays!



CHECK OUT THE GOODWIN COLLEGE E-NEWS BLOG

Check out the blog for news, events, announcements, stories, and more!



Riverside Magnet School shares some holiday cheer in the lobby!



Students from CTRA's Bridge to Success helped out at Operation E.L.F. (Embracing Lonely Families), making a memorable holiday season for families with a deployed loved one. With the surplus gifts on hand, the students were also able to provide for kids in a family shelter near CTRA.

BMAM on AARP

Kate Bolduc, Goodwin's Director of Business Innovation, was recently a guest on AARP Connecticut's *Real Possibilities*. The segment, which also featured AARP's Nora Duncan, who partners on initiatives with Goodwin, was entitled "Re-careering: What's Your Next Act?" <u>Click here to watch</u>.





On Dec. 14, Continuing Education Advanced Manufacturing team members Scott Kennedy, Guy LaBella, and Al Pucino visited Wethersfield High School in the Manufacturing Mobile Lab. During the 5-hour event, students learned about career opportunities in manufacturing and were introduced to steps in the process, including product design, prototyping, machining/assembly, and quality inspection.



Marketing & Communications' Erica Daigle is being featured statewide on billboards promoting Lamar Advertising... with a great call-out for Goodwin College!



Goodwin Shout-Out: Monica Niebrzydowski

As a volunteer for her alma mater, the University of Rhode Island, Monica Niebrzydowski, Administrative Assistant for Health Sciences, will serve as an advisor for a group of students on an Alternative Spring Break trip to Puerto Rico in March. The trip will be a week long and focus on serving the communities of Puerto Rico still recovering from the devastating effects of Hurricane Maria. This will be

Monica's second trip as an advisor and fifth trip overall. Way to go, Monica!

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On Dec. 14, Career Services hosted its latest Mocktails event, welcoming 10 guest networkers and 28 students and alumni. Twelve programs were represented. "Networking allowed me to discover areas I need to improve when presenting myself and my story," said one student. A guest added, "The entire event was very well done. I would love to do it again."

THIS WEEK



Upcoming Café Hours:

Closing 1 P.M. on Fri., Dec. 21
Closed Mon., Dec. 24, reopen Wed., Jan. 2
During break, open 8 A.M. to 1 P.M.
Closed Community Day, Jan. 7
Regular hours resume Mon., Jan. 14

UPCOMING EVENTS



Notice of Public Meeting - January 14

Notice of Goodwin College's intent to apply for U.S. EPA Brownfields Cleanup Grant; Notice of a Public Meeting to discuss, accept and consider Public Comment on the Draft Grant Proposal and draft Analysis of Brownfield Cleanup Alternatives (ABCA); and Request for Public Comment on the Draft Grant Proposal and draft ABCA. Goodwin College intends to apply for a *U.S.EPA Brownfields*

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Great Meadows Conservation Trust Winter Walks Return

The Great Meadows Conservation Trust has announced the winter walks for 2019, with Goodwin College among the co-sponsors. The February 10 walk at 1 p.m. features our own Bruce Morton. Peel away the centuries to imagine the river bank before the bridge, and explore the 300+ acre Crow Point property. Observe the process of



nature reclaiming the land and waterways excavated for fill to build the highway across the ancient farmland and wetlands of the great meadows. <u>Download flyer</u> for directions and details.

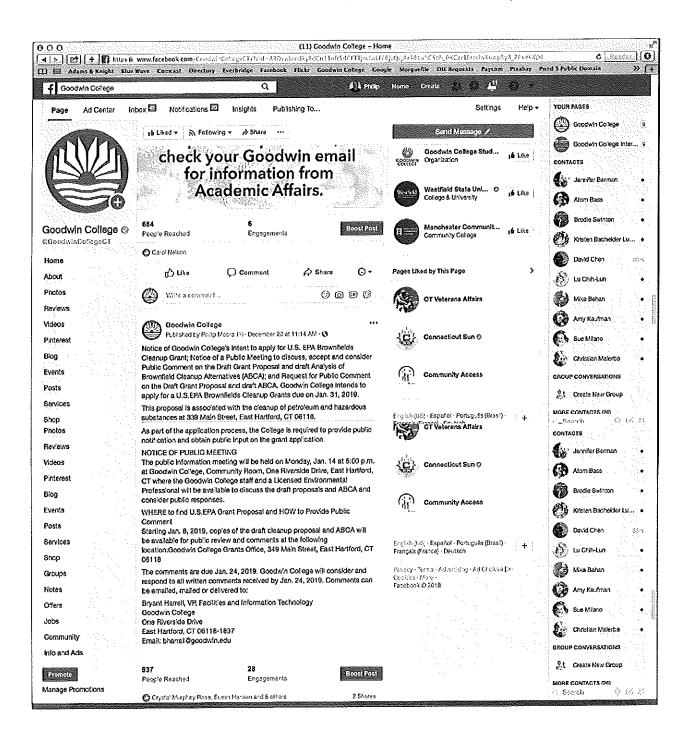
OTHER ANNOUNCEMENTS

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Notice of Public Meeting - January 14 GOLLEGE

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praited signage - posted in au boodwin academic buildings



Attachment B-Leveraging Resources

Goodwin College EPA Brownfields Cleanup Grant Application

GC has leveraged resources from the following state and federal funding sources:

- State of Connecticut Brownfields Redevelopment Authority and Department of Economic and Community Development (DECD), as well as the U.S. Economic Development Administration. GC has secured \$4 million from DECD to fund critical storm water drainage improvements to the aged infrastructure in the campus footprint. These improvements will allow for future development of college and commercial redevelopment.
- Since 2012 GC has received about \$1 million from the state Department of Energy and Environmental Protection (CT DEEP) to establish a two-mile multi-purpose nature trail that connects the campus to a regional network of trails.
- The area where 339 Main Street is located is part of GC's master plan redevelopment footprint. The total estimated cost of the master plan is \$38.1 million. Of that amount, GC envisions a construction loan of \$16.3 million, state funding of \$5.4 million, GC equity of \$16.4 million, and a cash investment of \$10.6 million

Attachment C

Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation 339 Main St., East Hartford, Connecticut

Prepared by Goodwin College

I. Introduction and Background

a. Site Location (address)
The site is located at 339 Main St. in East Hartford, CT (herein referred to as "the Site").

b. Previous Site Use(s) and any previous cleanup/remediation

The 0.82-acre site is comprised of a 12,140 square foot one-story masonry/concrete block building that was constructed in 1966 and modernized in 1986, including construction of a one-bay garage at the western end of the building. A paved parking lot is located east and south of the site building. The Site is owned by River Campus, Inc. and was formerly occupied by East Hartford Tire (EHT) (vehicle maintenance garage), Jim's Auto Repair (auto body repair shop), Component Finishing, Inc. (CFI) (former metal plating facility), and a transportation services company.

Site Assessment Findings

Based on the 2012 Phase I ESA research completed by Zuvic Carr, licensed engineering professionals, the Site meets the definition of an "establishment" since a body shop (Jim's Auto Repair) was located on the Site on or after May 1, 1967 and evidence (Hazardous Waste Manifests) of the generation or handling of hazardous waste at the property of over 100-kilograms per month by a former metal plating facility (CFI)) on or after November 19, 1980 was found.

The following AOCs were identified for the Site during the 2012 Phase I ESA:

- AOC 1: Former EHT Virgin/Waste Oil and Chemical Storage Area
- AOC 2: Former EHT Service Bays
- AOC 3: Former EHT Current and Former In-ground Hydraulic Lifts
- AOC 4: Former EHT Parts Washer
- AOC 5: Former CFI Shipping/Receiving Area
- AOC 6: Former CFI Plating Lines
- AOC 7: Former CFI Former Sumps and Associated Piping
- AOC 8: Former CFI Main Collection Area Chemical Process/Storage
- AOC 9: Former CFI Waste Storage and Treatment Area
- AOC 10: Former CFI FreonTM Degreaser/Dryer and FreonTM Dryer
- AOC 11: Current Compressor Room
- AOC 12: Former Compressor Room
- AOC 13: Former Jim's Auto Repair Garage and Storage/Office Area
- AOC 14: Current Dumpster
- AOC 15: Former On-Site Dumpsters
- AOC 16: On-Site Catch Basins/Drywells and Storm Drains
- AOC 17: Impact from Off-Site Sources

• AOC 18: Vehicle Storage Area

[Note that these AOCs were identified as recognized environmental conditions (RECs) in the 2012 Phase I ESA and in the 2012 Phase II ESA.]

Phase II Environmental Site Assessment Findings and Conclusions

The Phase II ESA was completed to evaluate potential impacts to soil and groundwater at each of the areas of concern identified in the 2012 Phase I ESA. The work completed by Zuvic Carr included the installation of soil borings and groundwater monitoring wells at the Site, and sampling and testing of soil and groundwater samples.

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Based on the analytical results, releases to soil and/or groundwater occurred at each of the 18 identified AOCs with the exception of the compressor room (AOC 12), off-site sources (AOC 17) and the vehicle storage area (AOC 18).

The results of the Phase II ESA indicate that releases have occurred to soil and/or groundwater at 15 of the 18 identified AOCs at the Site. The report recommended that a Phase III ESA be completed to evaluate the degree and extent of releases at the Site.

Phase I Environmental Site Assessment Update

Zuvic Carr conducted a Phase I ESA Update in December 2017 to evaluate the environmental conditions of the property since the date of the previous Phase I ESA (January 2012 to present day), and to determine the likelihood of a release of hazardous substances on the property. Three additional AOCs were identified for the Site during the Phase I ESA Update and are presented below.

- · AOC 19: Former On-Site Tobacco Barn and Agricultural Activities
- · AOC 20: Former On-Site Residential Building
- AOC 21: Former Jim's Auto Repair Garage Waste Paint Storage Area

Phase III Environmental Site Assessment

Zuvic Carr was retained by Goodwin College to conduct a Phase III Environmental Site Assessment of 339 Main Street. The purpose of the Phase III assessment was to evaluate the nature, degree, and extent of releases identified during the initial Phase II assessment conducted by Zuvic Carr in August 2012 and to evaluate if releases had occurred from newly identified Areas of Concern (AOCs) 19, 20, and 21, which were identified during a Phase I update completed by Zuvic Carr in December 2017. The Phase III assessment was performed in accordance with the Connecticut Department of Energy and Environmental Protection (CT DEEP) "Site Characterization Guidance Document."

Conclusions

Based on the analytical results, releases to soil and/or groundwater have occurred at each of the 21 identified AOCs at the Site except the existing compressor room (AOC 11), the former on-site residential building (AOC 20), and the vehicle storage area (AOC 18). The results of this Phase III ESA indicate that releases from the AOCs have been sufficiently characterized and Zuvic Carr recommends a remedial action plan be prepared to address the contamination that does not

meet RSR criteria. The RAP may include additional soil and groundwater sampling to determine the feasibility of presented remediation alternatives.

Remedial Action Plan

On Jan. 7, 2019, Zuvic Carr submitted a draft Remedial Action Plan to Goodwin College Vice President of Physical Facilities and IT Bryant Harrell. The draft Plan referenced the Phase III Environmental Site Assessment report that found releases that required remedial action were detected at the following AOCs):

- AOC 2, former East Hartford Tire service bays;
- AOC3, former in-ground hydraulic lifts;
- AOC 15, onsite dumpsters;
- AOC 16, catch basins/drywells and storm drains; and
- AOC 19, former onsite tobacco barn and agricultural activities.

In addition, groundwater downgradient of former site occupant, Component Finishing, Inc. (CFI) onsite operations, AOC 9 (waste storage and treatment area), is impacted with metals at concentrations in excess of the Surface Water Protection Criteria (SWPC). Additional action and potential remediation are warranted.

In connection with planned building renovations, Zuvic Carr completed a Hazardous Building Materials survey for asbestos containing material (ACM) and lead-containing paint in October 2018. Asbestos was identified in various building materials. Abatement of ACM prior to construction activities and precautions during construction for lead-containing paint will be required.

Summary of Areas of Concern (AOCs):

AOCs 2 and 3. Service bays and in-ground lifts: In August, September and October of 2018, three in-ground hydraulic lifts and associated tank reservoirs and piping were removed from garage bays 2, 3, and 4. Soil samples were submitted for laboratory analysis. Soil containing Extractable total petroleum hydrocarbons (ETPH) at a concentration that exceeded the RDEC remains at the bottom of bay 3 tank reservoir grave and from the north sidewall of the grave and will require additional remediation. The hydraulic lift piston, reservoir tank, and associated piping in the concrete pit inside Bay 4 were removed on Sept. 12, 2018. Soil containing analytes at concentrations exceeding applicable criteria are present below and near the pit and will require remediation. Borings were completed during the Phase III investigation to evaluate the extent and degree of contamination associated with the hydraulic lift. ETPH concentrations in soil around the concrete pit exceeded the RDEC and I/C DEC. The contamination is likely the result of leakage from the former reservoir tank and lift piston to soil at the bottom of the pit and lateral and vertical spread from there.

Soil located in garage bay 3 and bay 4 contained arsenic in concentrations that exceeded REDC and I/C DEC. Arsenic contamination in the two areas likely results from the presence of ash-containing fill in the samples.

In

ETPH concentrations in soil in bay 6 exceeded the RDEC, I/C DEC and the GB PMC in a surficial sample collected from below the concrete floor and is likely the result of releases from the tire company's vehicle servicing operations.

Remedial measures will be required to address the soil with concentrations above remedial criteria.

AOC 9. CFI waste treatment and storage area: Ammonia concentrations were elevated in soil samples collected from borings within the former waste treatment and storage areas; groundwater downgradient of the area contains elevated levels of ammonia. Ammonia concentrations in all soil and groundwater samples collected and tested to date are below the applicable remedial criteria. However, insufficient soil data exists to conclude that soil concentrations throughout the release area are compliant with the criteria. Additional soil sampling and testing is warranted prior to concluding that remediation is not required within the release area.

AOC 15. Onsite dumpsters: ETPH was detected in soil near the current dumpster location in the southern portion of the site. Based on survey data, the dumpster appears to be located on adjacent property at I High Street. ETPH concentrations in soil exceeded RDEC in surficial soil samples south of the concrete dumpster pad and is likely attributed to storage of oily materials in the dumpster. In addition, PAHs were detected in surficial soil near the former location of a dumpster, west of the building. The extent of the release areas has been delineated both vertically and laterally. Remedial measures will be required to address the soil with concentrations above remedial criteria.

AOC 16 Onsite catch basins/drywells and former storm drains: ETPH concentrations in soil in the northwest corner of the westernmost garage bay exceeded the RDEC, I/C DEC and the GB PMC. Soil in this area contains lead and nickel at concentrations that exceeded the RDEC; leachable lead was detected above the GB PMC. ETPH concentrations in soil located south of the westernmost garage space near a catch basin beneath a metal-grate ramp exceeded the RDEC. The extent of the two releases has been delineated both vertically and laterally. Remedial measures will be required to address the soil with concentrations above remedial criteria.

Remedial actions for AOC 16: In accordance with US EPA policies and procedures for presumptive remedies, excavation and offsite disposal of contaminated soil is the proposed presumptive remedy for these release areas. The remedial excavations will be guided by field screening of the soils with photoionization detector (PID) and visual observations. Confirmation soil samples will be collected from the extent of the excavations, including bottom and sidewall samples, and analyzed for ETPH, lead, nickel, copper, and/or zinc to confirm whether all soils above applicable remedial criteria have been removed.

AOC 19. Former onsite tobacco barn and agricultural activities: Pesticide releases at the site likely occurred in connection with tobacco cultivation at and near the site. A tobacco barn and outbuildings were present on the property prior to its redevelopment in 1966. Detectable concentrations of pesticides were identified in 12 of the 19 topsoil or relic topsoil samples analyzed. Topsoil near the current dumpster pad south of the site contains pesticides at

concentrations that exceed RDEC, I/C DEC and/or GB PMC. Additional sampling and testing for pesticides and metals is warranted to delineate the exceedance area prior to remediation.

Hazardous building materials: Asbestos identified in the following building materials will require removal or encapsulation: vinyl floors and associated mastic in portions of the main office area and in the small office area formerly occupied by Jim's Auto Repair, interior and exterior door and window caulk, basement windows, exterior caulk on doors, other caulk and glazing materials, roofing materials, including tar patch material at roof vents and penetrations and tar material on the overhang/canopy.

Project Goal (site reuse plan)

Clean and remediate 0.82 acres cleaned to minimize the health impacts of the sensitive populations residing in the area for renovation of the existing building as the new home for the Goodwin College Facilities Department, freeing up other college-owned property on Main Street for redevelopment.

II. Applicable Regulations and Cleanup Standards

a. Cleanup Oversight Responsibility

The cleanup will be conducted under the supervision of a CT licensed environmental professional (LEP) under voluntary program CGS Section 22a-133x. In addition, copies of technical reports prepared for the Site will be submitted to the CT Department of Energy and Environmental Protection (CT DEEP).

b. Cleanup Standards for major contaminants

Site ETPH, PAH, lead, and nickel contaminated soil will be remediated to residential standards, and applicable groundwater (GB) pollutant mobility standards. Meeting these standards would allow the Site to be developed for unrestricted use.

c. Laws and Regulations Applicable to the Cleanup

Laws and regulations that would be applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, the CT Remediation Standard Regulations (RSRs), and town by-laws. Federal, state and local laws regarding procurement of contractors to conduct the cleanup will be followed.

In addition, all appropriate permits and notifications (e.g. Call Before You Dig, soil transport/disposal manifests) will be obtained prior to work commencing.

III. Evaluation of Cleanup Alternatives

a. Cleanup Alternatives Considered

Remedial actions for AOCs 2 and 3: In accordance with US EPA policies and procedures for presumptive remedies, excavation and offsite disposal of contaminated soil is the proposed presumptive remedy for these release areas. The remedial excavations will be guided by field screening of the soils with photoionization detector (PID) and visual observations. Confirmation soil samples will be collected from the extents of the excavations, including bottom and sidewall samples, and analyzed for ETPH and/or arsenic to confirm whether all soils above applicable

remedial criteria have been removed. Soil in the ETPH excavation in bay 4 will be removed from below the groundwater table. Dewatering may be required during this remedial excavation and any wastewater discharge will be properly permitted and disposed off site.

Remedial actions for AOC 9: The need for any additional remediation in this area will be decided upon completion of the additional sampling and testing.

Remedial actions for AOCs 15 and 19: In accordance with US EPA policies and procedures for presumptive remedies, excavation and offsite disposal of contaminated soil is the proposed presumptive remedy for these release areas. The remedial excavations will be guided by field screening of the soils with photoionization detector (PID) and visual observations. Confirmation soil samples will be collected from the extent of the excavations, including bottom and sidewall samples, and analyzed for ETPH, lead, pesticides, and/or PAHs to confirm whether all soils above applicable remedial criteria have been removed. Additional soil borings will be advanced and the need for any additional remediation in this area will be evaluated upon completion of the sampling and testing.

Remedial action for AOC 16: In accordance with US EPA policies and procedures for presumptive remedies, excavation and offsite disposal of contaminated soil is the proposed presumptive remedy for these release areas. The remedial excavations will be guided by field screening of the soils with the photo-izonization detector and visual observations. Confirmation soil samples will be collected from the extent of the excavations, including bottom and sidewall samples, and analyzed for ETPH, lead, nickel, copper and/or zinc to confirm whether all soils above applicable remedial criteria have been removed.

Remedial action for ACM: Regular friable and regulated non-friable asbestos containing material (ACM) will be removed prior to any demolition of renovation activities that disturb ACM. It is anticipated that building renovations will likely involve disturbing all of the areas where ACM is present, so all ACM will likely be removed and disposed off site. The work will be undertaken in accordance with National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and Occupational Safety and Health Administration (OSHA) requirements. A Connecticut Licenses Asbestos Contractor (LAC) will be retained to complete the work, which will be overseen by a Connecticut Licensed Asbestos Project Monitor (LAPM). The LAPM will complete periodic air monitoring and a final visual inspection and re-occupancy air monitoring prior to occupancy of the building. The LAC will submit a notice of asbestos abatement to the Connecticut Department of Public Health at least 10 days prior to the start of abatement.

b. Cost Estimate of Cleanup Alternative

Feasibility Evaluation and Metal Exceedance in Groundwater-Pre-remediation (AOCs 9, 15, 19) Hazardous materials: \$62,776. ETPH: \$0. Total: \$62,776.

Asbestos Abatement: \$45,525. Total: \$45,525.

In-situ waste disposal profile characterization: \$3,505.

Soil Excavation, Transport, and Disposal-Remediation

45.

Hazardous Materials: \$53,382. ETPH: \$47,338. Total: \$100,720.

Post-remediation well installation. Post remediation groundwater monitoring, remedial action plan, abandonment. Hazardous materials: \$65,550. ETPH: \$58,130. Total: \$123,680.

c. Recommended Cleanup Alternative - TBD

H(.

OMB Number: 4040-0004 Expiration Date: 12/31/2019

Application for Federal Assistance SF-424								
* 1. Type of Submissi Preapplication Application Changed/Corre	on: ected Application	⊠ Ne			evision, select approp	opriate letter(s):		
* 3. Date Received: 01/30/2019	4. Applicant Identifier: Goodwin College							
5a. Federal Entity Identifier:			5k	o. Federal Award Ide	lentifier:			
State Use Only:								
6. Date Received by State: 7. State Application			Ident	tifier:				
8. APPLICANT INFO	8. APPLICANT INFORMATION:							
* a. Legal Name: Go	oodwin College	e, Inc.						
* b. Employer/Taxpayer Identification Number (EIN/TIN): * c. Organizational DUNS: 0850661570000								
d. Address:								
* Street1: Street2:	One Riverside	Drive						
* City:	East Hartford							
County/Parish:	Hartford							
* State: Province:		CT: Connecticut						
* Country:					USA: UNITED ST	STATES		
·	06118-1837				OBIT ONTIDE D			
e. Organizational U	nit:							
Department Name:				Di	ivision Name:			
Facilities and	IT Department	-		n	./a			
f. Name and contac	t information of p	erson to	be contacted on m	atter	s involving this ap	pplication:		
Prefix: Mr.			* First Name	e:	Christopher			
Middle Name: Ger	ard	_						
* Last Name: Bla	ke							
Suffix:								
Title: Grants Off	icer							
Organizational Affiliat	ion:							
Goodwin College								
* Telephone Number:	* Telephone Number: (860) 727-6950 Fax Number: (860) 291-9840							
* Email: cblake@g	goodwin.edu							

Application for Federal Assistance SF-424							
* 9. Type of Applicant 1: Select Applicant Type:							
O: Private Institution of Higher Education							
Type of Applicant 2: Select Applicant Type:							
Type of Applicant 3: Select Applicant Type:							
* Other (specify):							
* 10. Name of Federal Agency:							
Environmental Protection Agency							
11. Catalog of Federal Domestic Assistance Number:							
66.818							
CFDA Title:							
Brownfields Assessment and Cleanup Cooperative Agreements							
* 12. Funding Opportunity Number:							
EPA-OLEM-OBLR-18-07							
* Title:							
FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS							
13. Competition Identification Number:							
Title:							
14. Areas Affected by Project (Cities, Counties, States, etc.):							
Add Attachment Delete Attachment View Attachment							
* 15. Descriptive Title of Applicant's Project:							
Goodwin College Brownfields FY19 Cleanup Grant							
Attach supporting documents as specified in agency instructions.							
Add Attachments Delete Attachments View Attachments							

	Application for Federal Assistance SF-424							
16. Congressional Districts Of:								
* a. Applicant	CT01	* b. Program/Project CT01						
Attach an additio	nal list of Program/Project Congressional Distri	cts if needed.						
		Add Attachment Delete Attachment View Attachment						
17. Proposed P	roject:							
* a. Start Date:	* a. Start Date: 06/01/2019 * b. End Date: 05/31/2022							
18. Estimated Funding (\$):								
* a. Federal	400,000.00							
* b. Applicant	80,000.00							
* c. State	0.00							
* d. Local	0.00							
* e. Other	0.00							
* f. Program Inco	ome 0.00							
* g. TOTAL	480,000.00							
* 19. Is Applica	tion Subject to Review By State Under Exe	cutive Order 12372 Process?						
a. This app	ication was made available to the State und	der the Executive Order 12372 Process for review on						
b. Program	is subject to E.O. 12372 but has not been s	elected by the State for review.						
C. Program	is not covered by E.O. 12372.							
* 20. Is the App	licant Delinquent On Any Federal Debt? (f "Yes," provide explanation in attachment.)						
Yes	⊠ No							
If "Yes", provide	e explanation and attach							
		Add Attachment Delete Attachment View Attachment						
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.								
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